

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

Case No: 1:23-MJ-131

DESMOND JUWAN HEMBY;
SEAN DEMARCO STANFIELD;
MICHAEL ANTHONY LANGLEY;
FREDI D'AVION WARD

Defendants

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANTS**

I, Blake Frohnapfel, being duly sworn, hereby depose and state that:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and I have been so employed since 2021. My principal duties include the investigation of criminal allegations of government fraud, bribery and corruption involving public officials, violations of campaign finance law, mail theft, and mail and wire fraud. I have received training and have worked with other FBI Agents who have extensive training and experience in the enforcement of the laws of the United States. As a Federal Agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

2. I submit this affidavit in support of a criminal complaint and arrest warrants charging DESMOND JUWAN HEMBY ("HEMBY"), SEAN DEMARCO STANFIELD ("STANFIELD"), MICHAEL ANTHONY LANGLEY ("LANGLEY"), and FREDI D'AVION WARD ("WARD"), while being U.S. Postal Service employees, with conspiracy to violate 18 U.S.C. § 1709, that is a conspiracy to embezzle and steal packages, parcels and mail, and their

contents, which had been placed in the custody and control of the United States Postal Service and intended to be conveyed by mail, all in violation of 18 U.S.C. § 371.

3. The facts set forth in this affidavit are based on my personal knowledge; training and experience, as well as information and evidence obtained from other law enforcement officials and witnesses. All observations I did not personally make were relayed to me by the individuals who made them or come from my review of records, documents, and other physical evidence obtained during this investigation. This affidavit contains information necessary to support probable cause, but it is not intended to include each and every fact and matter observed by me or known to law enforcement. When I refer to interviews conducted, I am summarizing their substance, rather than including them in their entirety or verbatim, unless otherwise noted. In addition, my experience and training as an FBI Special Agent forms the basis of the opinions and conclusions set forth below.

PROBABLE CAUSE

The Targets

4. HEMBY, STANFIELD, WARD, and LANGLEY were all employed as mail handlers by the United States Postal Service. Each, at some point, worked a night shift with their tour of duty located at the Dulles Processing and Distribution Center, located at 44715 Prentice Drive, Sterling, Virginia 20101. The Dulles Processing and Distribution Center ("Dulles P&DC") is located within the Eastern District of Virginia.

5. A mail handler's primary duties include unloading, sorting, and safeguarding the integrity, and flow of the mail at the Dulles P&DC. The Dulles P&DC primarily processes incoming mail from around the world. Mail arrives at the Dulles International Airport daily, is transferred to the Dulles P&DC, and is then destined for customers in Maryland, Virginia, and the

District of Columbia. Mail handlers are primarily trained on-the-job, and the amount of training received depends on how long an employee needs to learn how to adequately fulfill his or her work responsibilities.

6. USPS policy requires all new employees to sign PS Form 8139, titled “Your Role in Protecting the Security of the United States Mail.” The form states, among other declarations, that USPS employees are not authorized to open, inspect, tamper, or delay the mail. The form makes clear that any employee committing these acts could be prosecuted under 18 U.S.C. § 1709, and that employees additionally have a duty to report their work colleagues engaged in these unauthorized acts. Also contained in this form is the following:

“I fully understand that it is a crime, punishable by fine or imprisonment, or both, to knowingly and willingly obstruct or delay the mail, or to steal or attempt to steal mail of any kind, even if it appears worthless, or to allow others to do so. My signature below indicates that I have read and fully understand the above I will comply.”

7. HEMBY signed Form 8139 on July 9, 2013. STANFIELD signed Form 8139 on May 18, 2020. LANGLEY signed Form 8139 on September 29, 2016. The USPS Human Resources Office indicated that they were unable to locate WARD’s signed PS Form 8139.

The Mail Theft Scheme

8. Based on the evidence collected and reviewed in this investigation, I submit there is probable cause to believe HEMBY, STANFIELD, WARD, and LANGLEY conspired with one another, and with others known and unknown, to steal the contents of United States Postal Service parcels that had been placed in the custody and control of the United States Postal Service and intended to be conveyed by mail.

The Origin of the Investigation

9. In July 2021, the United States Postal Service Office of Inspector General (USPS-OIG) began receiving multiple complaints regarding alleged misconduct and theft by multiple USPS employees assigned to the Dulles P&DC. Between July 2021 and March 2023, there were several complaints, both from anonymous and known Postal Service employees and managers, stating that multiple mail handlers and dock expeditors, both known and unknown, were working in concert to rifle through and steal the contents of parcels at the Dulles P&DC. Among those accused of thefts in these various complaints were HEMBY, STANFIELD, and LANGLEY.

Law Enforcement Activities

10. Since receiving these initial complaints, law enforcement conducted several surveillance operations at the Dulles P&DC resulting in the identification of multiple USPS employees, including HEMBY, STANFIELD, LANGLEY, and WARD, tampering with and opening boxes, punching holes in the boxes, and stealing items from these boxes. All boxes and parcels were being processed at the Dulles P&DC plant and were in USPS custody when these actions occurred.

11. For instance, on October 7, 2022, video surveillance captured LANGLEY opening a white parcel in the mail stream and taking items from it, putting the stolen items into a black plastic bag.

12. On October 13, 2022, video surveillance captured HEMBY, STANFIELD, and LANGLEY riffling through packages in the mail stream, poking or cutting holes in them, feeling inside them, and tossing them aside.

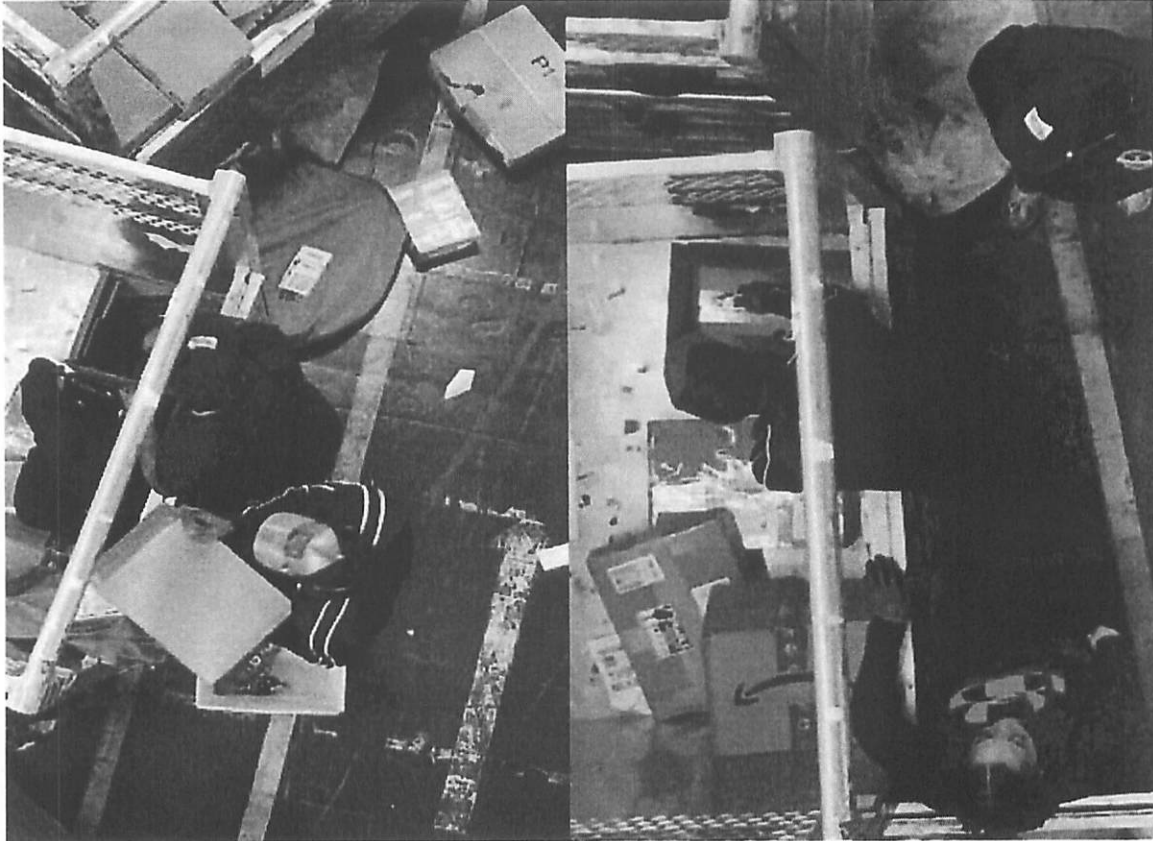
13. On or about February 2, 2023, law enforcement captured LANGLEY on surveillance video removing items from a large USPS box. Later in the shift, LANGLEY was

observed placing the item in a black jacket and shortly after, was observed leaving the Dulles P&DC.

14. On March 30, 2023,¹ surveillance footage captured HEMBY, STANFIELD, and WARD during their shared shift at the Dulles P&DC stealing contents from USPS parcels. At one point during the shift, HEMBY was observed opening a brown parcel filled with what was observed to be vacuum sealed bags. HEMBY, STANFIELD, and WARD were observed communicating with one another, and then proceeded to take turns placing the vacuum sealed bags into their personal jackets. During the same shift, STANFIELD was captured on video opening an additional parcel. HEMBY, STANFIELD, and WARD took turns examining the package's contents and placing the contents in their jacket pockets. Later, HEMBY and WARD were observed exiting the building with their jackets filled with the stolen items. Screen shots from these videos are provided below.



¹ For law enforcement personnel to continue surveillance at a large facility such as Dulles P&DC, a request was made to a Dulles P&DC supervisor to have HEMBY, STANFIELD, and WARD work in close proximity.



Execution of Search Warrants and Voluntary Interviews Conducted at Dulles P&DC

15. On April 21, 2023, the Honorable William E. Fitzpatrick, signed search warrants authorizing the search of the persons of HEMBY, STANFIELD, WARD, and LANGLEY, to include the search and seizure of electronic devices on their persons, as noted in case numbers 1:23-SW-220 through 223.

16. On April 27, 2023, the shift that the search warrants were executed, HEMBY, STANFIELD, and WARD agreed to voluntary, non-custodial, interviews. LANGLEY did not work the April 27, 2023, shift, but instead came in for his next scheduled shift starting April 28, 2023, continuing into the morning of April 29, 2023. In the early morning of April 29, 2023, the morning his search warrant was executed, LANGLEY agreed to a voluntary, non-custodial, interview. The interviews with HEMBY, STANFIELD, WARD, and LANGLEY were recorded.

On the same shift, at the conclusion of each interview, the search warrants for the search of HEMBY, STANFIELD, WARD, and LANGLEY were executed. During those searches, four electronic devices, one device each belonging to HEMBY, STANFIELD, WARD, and LANGLEY were collected. A folding knife was also collected from LANGLEY.

17. During HEMBY's interview on April 27, 2023, he at first denied that he was involved, but then later admitted that he opened USPS parcels to search for and steal marijuana. HEMBY added he often placed the stolen items into his jacket, and then stored the stolen items in a USPS locker at the Dulles P&DC or in his vehicle before taking the stolen items home. HEMBY stated he did not share any stolen items or proceeds with STANFIELD or WARD. HEMBY added he learned about the mail theft scheme from a known individual who is not a subject of this affidavit.

18. HEMBY was shown surveillance video captured by law enforcement from March 30, 2023. While reviewing the video, HEMBY noted STANFIELD called HEMBY over to him. HEMBY commented he placed an item, which he believed was a jar containing marijuana, into his pocket. HEMBY was shown a photograph from the March 30, 2023, surveillance. HEMBY affirmed he was one of the individuals in the photograph, which HEMBY signed. The photograph, signed by HEMBY, is shown below:



Stanfield

19. During STANFIELD's interview on April 27, 2023, STANFIELD admitted he tampered with and opened USPS parcels to search for and steal marijuana. STANFIELD estimated he stole approximately 20 pounds of marijuana from USPS parcels during his USPS employment. STANFIELD estimated he profited approximately \$10,000 from the sale of stolen items obtained from USPS parcels. STANFIELD added if the stolen items were too large to be concealed and carried within his jacket, an unnamed co-conspirator would be notified to bring a vehicle to the loading docks at the Dulles P&DC to retrieve the stolen items.

20. At the conclusion of the interview, STANFIELD signed a sworn statement. Within this signed statement, STANFIELD attested to the accuracy of the following excerpt:

"I have been a postal employee for about four years. Around the beginning of 2022, I started stealing from the mail when I worked shifts as a mail handler. I identified packages that smelled like marijuana, opened them, removed the marijuana and moved

it to my personal vehicle. I sold the marijuana to get extra money to provide to my family... “

21. During WARD's interview on April 27, 2023, WARD admitted she stole the contents of USPS parcels while employed as a USPS employee at the Dulles P&DC. WARD added she would often place the stolen items within her jacket to conceal the stolen items during their removal from the Dulles P&DC. WARD stated that she served as a “look-out” for HEMBY, STANFIELD, and LANGLEY to ensure other coworkers and supervisors were not observing WARD, HEMBY, STANFIELD, and LANGLEY steal the contents of the USPS parcels. WARD stated that she was either paid in cash or given marijuana for her work as a “look-out,” but that she was not the one actually cutting open the boxes. WARD said that she, HEMBY, STANFIELD, and/or LANGLEY would occasionally meet during a lunch break or at a gas station near the Dulles P&DC to sort through the stolen items.

22. WARD estimated the total value of money she received from participating in, and assisting HEMBY, STANFIELD, and LANGLEY with, the theft of mail at approximately \$1,000. WARD was shown a series of photographs from the March 30, 2023, surveillance operation. WARD confirmed she took the items out of the USPS parcel and that she did not have permission to access the USPS parcels.

23. During LANGLEY's interview on April 29, 2023, LANGLEY admitted he opened USPS parcels to search for and steal marijuana. LANGLEY affirmed he did not have permission to open any parcels nor remove and take any of the contents. LANGLEY estimated that the value of the stolen USPS package contents was approximately \$5,000. LANGLEY acknowledged witnessing HEMBY and STANFIELD opening USPS parcels. LANGLEY added he,

STANFIELD and HEMBY would sometimes show each other stolen contents from the USPS parcels.

24. LANGLEY was shown photographs from the surveillance video captured on or about February 2, 2023. While reviewing the photographs, LANGLEY affirmed he placed an item into his jacket, and then subsequently removed the item from the facility. LANGLEY affirmed he was the individual depicted in the photographs from on or about February 2, 2023, as shown below:



Digital Evidence

25. Pursuant to the federal search warrants, the four cellular devices seized were searched. The evidence obtained from these cellular devices show that HEMBY, STANFIELD, WARD and LANGLEY and others involved in the conspiracy utilized various messaging applications to communicate about, among other things, the conspiracy described throughout this affidavit.

26. On or about August 6, 2022, at approximately 6:44 am UTC, STANFIELD sent a text message to HEMBY stating "I just found this". The text message was accompanied by a

photograph of suspected marijuana. Based on my training and experience, I believe STANFIELD was showing HEMBY the item he was able to steal from the Dulles P&DC. According to the STANFIELD's USPS Form 3972, STANFIELD worked on August 6, 2022.

27. On or about October 27, 2022, HEMBY sent a text message to LANGLEY stating, "What it's looking like". To this, LANGLEY replied, "I was only able to get one out of that joint too many ppl [people] was walking around looking." HEMBY replied, "Damn I'm sick how many was in there". LANGLEY then replied, "I feel a few of them in there can't say how many but it was more than 4". Based on my training and experience, I believe LANGLEY was notifying HEMBY he was only able to steal one item from a package, although it contained additional items, as he was concerned there were too many other USPS workers around who may have been able to observe him stealing.

28. Later that same day, HEMBY sent a text message to STANFIELD stating "Spanked dem [them] today but I swear Mike finessed me." SEAN replied, "For how many". HEMBY added, "Like 8 but I found a dumb joint wit[h] like 6 or better he say he only could get one." Based on my training and experience, I believe HEMBY was telling STANFIELD he "spanked dem", or was successful in stealing several items, yet HEMBY believed LANGLEY was able to steal more items than the one item he claimed, and LANGLEY was being dishonest with HEMBY. In a later message, STANFIELD responded, "We back at it all next week." I believe STANFIELD's message to HEMBY was reassurance the mail theft would continue upon STANFIELD's return to work.

29. On or about March 28, 2023, WARD sent a text message to a telephone number ending in 8673 stating, "I get pounds of weed out the post office". The user of 8673 replied, "You say that like idk [I don't know]... And you don't they sell it to you cuz you set up They space...Ik

[I know] the whole system and ben knew”. To this, WARD replied, “they don’t sell me, whatever I get out is mine.” Based on my training and experience, I believe WARD was explaining she steals marijuana during her employment at the Dulles P&DC, and that other co-conspirators do not sell the marijuana to her, but that she keeps the items she steals. Later, WARD asks the user of 8673 where he learned this information, in which the user of 8673 states, “Multiple ppl [people] llss [laugh like sh--] but dez broke it down”. I believe the user of 8673 is stating they learned the details of the scheme from “dez’, who I believe is HEMBY, yet several others aware of this mail theft scheme also explained it to the user of 8673.

30. On multiple occasions, advance notice was provided among HEMBY, STANFIELD, WARD, and LANGLEY regarding the quantity of the mail. I believe this was done to inform the others if there was a high quantity of mail, as this would increase the likelihood of locating and stealing desired contents from packages. For instance, on or about March 25, 2023, HEMBY sent a text message to WARD stating, “Lmk [let me know] what it look like when u get there I might come in”. WARD replied, “ok...not much mail”. I believe WARD was responding to HEMBY’s request with notification that there was a low quantity of mail.

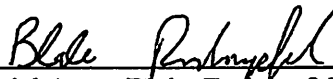
31. On or about April 8, 2023, HEMBY sent a text message to STANFIELD stating, “You walke[d] in late to a gold mine”. I believe HEMBY was notifying STANFIELD that HEMBY was able to locate numerous high value items within USPS packages, prior to STANFIELD’s arrival to work. A few hours following HEMBY’s text to STANFIELD, WARD and HEMBY sent numerous texts about meeting while at work. At the conclusion of the conversation, WARD sent a text to HEMBY stating, “don’t forget about me”. HEMBY replied with an Apple Cash payment to WARD. WARD and HEMBY’s USPS Form 3972 indicate both

WARD and HEMBY worked on April 8, 2023. I believe WARD's message to HEMBY was a payment request for her assistance in the mail theft scheme.

CONCLUSION

32. Based on the foregoing, I submit there is probable cause to conclude DESMOND JUWAN HEMBY, SEAN DEMARCO STANFIELD, MICHAEL ANTHONY LANGLEY, and FREDI D'AVION WARD, while employed as postal officers at the Dulles P&DC, conspired violate 18 U.S.C. § 1709, that is to steal the contents of United States Postal Service parcels that had been placed in the custody and control of the United States Postal Service and intended to be conveyed by mail, all happening at various locations within the Eastern District of Virginia and elsewhere, all in violation of 18 U.S.C. § 371.

Respectfully submitted and attested to in accordance with the requirements of Fed. R. Crim. P. 4.1 via telephone on July 5, 2023



Special Agent Blake Frohnappfel
Federal Bureau of Investigation

Sworn and subscribed before me on
July 5, 2023

Digitally signed by Lindsey
Vaala
Date: 2023.07.05 10:02:34
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The Honorable Lindsey R. Vaala
United States Magistrate Judge
Alexandria, Virginia